

**UNITED STATES BANKRUPTCY
COURT NORTHERN DISTRICT OF
OHIO EASTERN DIVISION**

In re:)	Case No. 21-61491
)	
Squirrels Research Labs LLC,)	Chapter 11
)	
Debtor.)	Judge Tiiara N.A. Patton

**MOTION OF PAUL BILLINGER TO LIMIT SERVICE OF THEIR MOTION FOR
RECONSIDERATON OF PAUL BILLINGER, TO THE ORDER APPROVING
ALLOCATION OF PROCEEDS OF COMPROMISE AND SETTLEMENT BETWEEN
DEBTORS AND CINCINNATI INSURANCE COMPANY**

I hereby move the Court to limit service of the Motion for Reconsideration to Order Approving Allocation of Proceeds of Compromise and Settlement Between Debtors and Cincinnati Insurance Company (Doc. 360) (the “Motion for Reconsideration”). In support of this Motion, I respectfully state the following:


1. The Motion for Entry of an Order Approving Compromise and Settlement with Cincinnati Insurance Company (Doc. 323) (the “Motion to Compromise”) was filed by Debtors’ counsel on April 9, 2024 and served on all creditors and parties in interest, as set forth on the certificate of service.
2. My Motion for Reconsideration is wholly and completely restricted in scope to matters within the Motion to Compromise.
3. Other than Debtors’ counsel, no other parties are engaged with or have expressed concern regarding the Motion to Compromise in the months following.
4. The list of all creditors and parties in interest is extensive, and includes entities and individuals in foreign jurisdictions. Mailing a copy of the Motion for Reconsideration to all of those creditors and parties in interest would be expensive

and burdensome. I submit that cause exists to limit notice of the Motion for Reconsideration to (1) Julie K. Zurn (0066391) BROUSE McDOWELL, LPA, by email to jzurn@brouse.com. I believe limiting service of the Motion for Reconsideration to this party is appropriate and adequate service and provides fair and reasonable notice.

WHEREFORE, I respectfully request the Court enter an Order substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: July 29th, 2024

Respectfully submitted,




Paul Billinger
E-Mail:
paul.billinger@toreaconsulting.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Limit Service for Motion for Reconsideration to Order Approving Allocation of Proceeds of Compromise and Settlement Between Debtors and Cincinnati Insurance Company was served by fax on July 29th, 2024, as permitted by the Court.

With an emailed copy to Julie K. Zurn on July 29th, 2024:
Julie K. Zurn
Brouse McDowell LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
jzurn@brouse.com



Paul Billinger

UNITED STATES BANKRUPTCY
COURT NORTHERN DISTRICT OF
OHIO EASTERN DIVISION

In re:)	Case No. 21-61491
)	
Squirrels Research Labs LLC,)	Chapter 11
)	
Debtor.)	Judge Tiiara N.A. Patton

**ORDER APPROVING MOTION OF PAUL BILLINGER TO LIMIT
SERVICE OF THEIR MOTION FOR RECONSIDERATION OF THE
ORDER APPROVING ALLOCATION OF PROCEEDS OF
COMPROMISE AND SETTLEMENT BETWEEN DEBTORS AND
CINCINNATI INSURANCE COMPANY**

This matter having come before the Court upon Paul Billinger’s Motion to Limit Service of their Motion for Reconsideration to Order Approving Allocation of Proceeds of Compromise and Settlement Between Debtors and Cincinnati Insurance Company (the “Motion”); the Court having reviewed the Motion, finds it to be well taken; therefore, it is hereby adjudged, decreed, and

ORDERED that the Motion is granted as set forth herein; and it is further

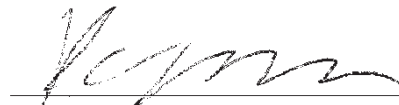
ORDERED that service of the Motion for Reconsideration to Order Approving Allocation of Proceeds of Compromise and Settlement Between Debtors and Cincinnati Insurance Company, by email to Debtors’ Counsel Julie K. Zurn at jzurn@brouse.com is appropriate and adequate service and provides fair and reasonable notice of the Motion. No further service of the Motion is required.

IT IS SO ORDERED.

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Dated: July 26th, 2024

Respectfully submitted,



Paul Billinger

E-Mail: paul.billinger@toreaconsulting.com

NOTICE PARTIES:

Via email:

Julie K. Zurn
Brouse McDowell LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
jzurn@brouse.com